

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

RESIDENTIAL FUNDING COMPANY, LLC (F/K/A  
RESIDENTIAL FUNDING CORPORATION), et al.,

Defendants.

Civil Action No. 3:11-30035-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

DB STRUCTURED PRODUCTS, INC., et al.,

Defendants.

Civil Action No. 3:11-30039-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

RBS FINANCIAL PRODUCTS INC. (F/K/A  
GREENWICH CAPITAL FINANCIAL PRODUCTS,  
INC.), et al.,

Defendants.

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Civil Action No. 3:11-30044-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

DLJ MORTGAGE CAPITAL, INC., et al.,

Defendants.

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Civil Action No. 3:11-30047-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE  
SECURITIES CORP., et al.,

Defendants.

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Civil Action No. 3:11-30048-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., et al.,

Defendants.

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Civil Action No. 3:11-30094-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

GOLDMAN SACHS MORTGAGE COMPANY, et al.,

Defendants.

Civil Action No. 3:11-30126-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

IMPAC FUNDING CORPORATION, et al.,

Defendants.

Civil Action No. 3:11-30127-MAP

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MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

v.

HSBC BANK USA, NATIONAL ASSOCIATION, et  
al.,

Defendants.

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Civil Action No. 3:11-30141-MAP

**JOINT SUBMISSION OF THE STIPULATION AND [PROPOSED] ORDER FOR THE  
PRODUCTION AND EXCHANGE OF CONFIDENTIAL INFORMATION**

Pursuant to the Court's December 4, 2012 Scheduling Order, the parties have negotiated a joint proposed protective order for the production and exchange of confidential information in the above-captioned actions. They have reached agreement as to all but one provision, and they hereby submit their joint proposed protective order without the disputed provision as Exhibit A. The text of the disputed provision proposed by Defendants is set forth in Exhibit B. Concurrently with this joint submission, MassMutual, which opposes inclusion of the disputed provision in the protective order, and Defendants, which favor the inclusion of the disputed provision, will file separate submissions with the Court setting forth their respective positions.

DATED: December 14, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 14th day of December, 2012.

*/s/ Edward J. McDonough Jr.*

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